

Exhibit 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re: :
WOOD, : Docket #20cv2489
 : 1:20-cv-02489-LTS-GWG
 :
Plaintiff, :
 :
- against - :
 :
MIKE BLOOMBERG 2020, INC., :
 : New York, New York
Defendant. : July 16, 2020
 :
----- : TELEPHONE CONFERENCE

PROCEEDINGS BEFORE
THE HONORABLE GABRIEL W. GORENSTEIN,
UNITED STATES MAGISTRATE JUDGE

APPEARANCES:

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whatever.

MS. ABRAHAMSON: Yes.

THE COURT: So it doesn't seem like there is any issue of custodians because you don't care who emailed them. Your client is essentially the custodian and there's no one else's emails need to be searched, am I right or am I wrong?

MS. ABRAHAMSON: Yes, Your Honor, I was referring to the plaintiff as the custodian, I'm sorry if that was unclear. So as the case progresses we would want to search other custodians' emails but we would be content at the initial phase of just searching our own plaintiffs' emails that are in the possession of defendants right now.

THE COURT: And the reasons you would want other custodians down the road is you want to see if other custodians talk to each other about whatever these promises and inducements were, is that right?

MS. ABRAHAMSON: Yes, Your Honor.

THE COURT: Okay, but you are ready to start just with your plaintiffs?

MS. ABRAHAMSON: Yes, Your Honor.

THE COURT: Okay. So anyway, I told you to hold the thought, keep going.

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MS. ABRAHAMSON: The one additional thought is just the reason there is some urgency to this is that the campaign no longer exists and we do have concerns about the accessibility of the witnesses. And we think that having this preliminary ESI would help us see who potential witnesses would be as the case moved along. And it has been our experience as attorneys that when witnesses are not within the control of the defendant it is harder to contact them, it's harder to get documents from them, and it is harder to schedule depositions for them. And so we think there is some timeliness urgency in moving forward.

You know, we also do have, there have been times even when both parties are proceeding in complete good faith that there is a discrepancy in the way preservation is interpreted. And the longer it goes before we are able to receive any of the documents, the more we have concerns that there might be some preservation issues that would be harder to address.

THE COURT: Okay, are you done on the discovery issue?

MS. ABRAHAMSON: Yes, Your Honor.

THE COURT: All right, I'm going to do

C E R T I F I C A T E

I, Carole Ludwig, certify that the foregoing transcript of proceedings in the United States District Court, Southern District of New York, Wood versus Mike Bloomberg 2020, Inc., Docket #20cv2489, was prepared using PC-based transcription software and is a true and accurate record of the proceedings.

Signature Carole Ludwig

Carole Ludwig

Date: July 20, 2020